

March 30, 2011

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 10-255 – Ex Parte Notice

Dear Ms. Dortch:

On March 29, 2011, John Murdock, President of Bandwidth.com, Inc. ("Bandwidth.com"); Kevin Breault, Vice President of Business Development; Ray Paddock, Vice President of Emergency Services; and the undersigned met with James Barnett, David Furth, Patrick Donovan, Henning Schulzrinne, and David Siehl of the Public Safety and Homeland Security Bureau, to discuss the Commission's consideration of Next Generation 9-1-1 ("NG9-1-1").

At these meetings, we discussed issues raised by Bandwidth.com in its comments filed in the above-referenced proceeding. Bandwidth.com reiterated its recommendation that the Commission adopt the NENA i3 Solution as part of a standards-based regime for NG9-1-1, with explicit regulations only for core elements of the NG9-1-1 network. Bandwidth.com discussed its participation in the development and implementation of the i3 Solution and in NENA's Industry Collaborative Events to develop interoperability standards for NG9-1-1. Bandwidth also discussed recent requests for proposals by 9-1-1 administrators in Alabama and other states that explicitly requested the i3 Solution, and responded to some of the criticisms of the i3 Solution submitted in comments. We discussed the feasibility of text messaging "9-1-1" currently and in NG9-1-1 and Bandwidth's involvement in a pilot program to test 9-1-1 texting in a large metropolitan area in the Southwest.

We recommended the Commission implement rules governing interconnection, interoperability and the core standards for NG9-1-1 and leave the details of meeting those standards to the industry. Bandwidth.com noted that if the Commission imposes too much regulation or implements detailed technical, operational or other requirements, it will crush innovation. Instead, Bandwidth.com suggested that if the Commission implements a standard-based regime that makes the provision of NG9-1-1 cost-effective, it is conceivable that some innovators would elect to provide NG9-1-1 for particular uses as a value add even where not mandated by regulation to do so.

Bandwidth.com also raised the issue of state regulatory and other obstacles based on legacy 9-1-1 infrastructure that may impede nationwide implementation of NG9-1-1. We discussed Bandwidth.com's own experience with these issues as well as those shared by others with similar

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experiences. Because of these impediments, Bandwidth.com recommended the Commission adopt nationwide NG9-1-1 standards to ensure consistency, uniformity, and interoperability.

This ex parte notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206.

Respectfully submitted,

/s/

Michael P. Donahue
Counsel for Bandwidth.com, Inc.

cc: James Barnett (via email)
David Furth (via email)
Patrick Donovan (via email)
Henning Schulzrinne (via email)
David Siehl (via email)